

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

**DONALD TREANNIE, HEATHER
TREANNIE, JEAN LICATA, SHELBY
VENUTI, MARK VENUTI, NATALIE
LAYMAN, and ARSENIA
RODRIGUES, on behalf of themselves
and all others similarly situated,**

Plaintiffs,

v.

**J.P. MORGAN CHASE BANK, NA,
CHASE HOME FINANCE, LLC**

Defendants.

Civil Action No. 1:10-CV-10380-RGS

JOINT MOTION FOR NINETY-DAY STAY

Plaintiffs Donald Treannie, Heather Treannie, Jean Licata, Mark Venuti, Shelby Venuti, Natalie Layman, and Arsenia Rodrigues, on behalf of themselves and all others similarly situated, and defendants JPMorgan Chase Bank, N.A. and Chase Home Finance LLC respectfully request that the Court stay this matter for 90 days to allow the parties time to conclude settlement discussions without simultaneously expending time and resources to litigate this action.

In support of this joint motion, the parties state as follows:

1. The parties have been engaged in settlement discussions, including participation in a mediation conference before a mediator on April 13, 2011.
2. The parties desire to continue settlement discussions to determine whether this dispute can be resolved without the need for further litigation.
3. While these discussions continue, the parties desire to avoid the otherwise considerable time and costs in litigating this matter.

4. For these reasons, the parties respectfully request that the Court stay all pending deadlines for a period of 90 days.
5. The parties have not previously sought any extension of deadlines in this action based on settlement discussions.
6. Each party reserves the right to seek an order lifting the stay in the event that it believes that further negotiations would be fruitless.

Wherefore, the parties respectfully request that the Court stay this matter for 90 days.

Dated: April 19, 2011

Respectfully submitted,

Plaintiffs,

Donald Treannie, Heather Treannie, Jean Licata, Mark Venuti, Shelby Venuti, Natalie Layman, and Arsenia Rodrigues, on behalf of themselves and all others similarly situated,

By their attorneys,

/s/ Gary Klein

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Defendants,
JPMorgan Chase Bank, N.A. and Chase Home
Finance LLC,

By their attorneys,

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CERTIFICATE OF SERVICE

I, Matthew A. Kane, hereby certify that a true and correct copy of the foregoing document was served upon each other party or their counsel via the Court's CM/ECF system, or, if not registered with the Court's CM/ECF system, then via first class mail, postage prepaid, on April 19, 2011.

/s/ Matthew A. Kane
Matthew A. Kane